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**Subject:** Calabasas Landfill SWFP Revision concurrence by February 20, 2016 - Green ADC at 24%

Scott:

CalRecycle has until February 20, 2016 to concur with the Calabasas Landfill SWFP Revision. The JTD must have been determined to be "complete and correct" by the LEA, where the JTD will allow 24% green waste ADC to refuse use (attached is the JTD page noting 24% use). The 2014 CalRecycle Investigation placed this landfill at 28.6% and was flagged, but" no indication of overuse of greenwaste ADC was found."

Of course, the landfill bible, SWANA and common engineering practices have determined for years that landfill typically use a cover ratio of 25% ADC to refuse, for all cover materials (daily, intermediate, and final), where daily cover would be 15% and 20% at the most. Being a larger landfill, the ratio should be even less.

With CalRecycle concurring with this SWFP Revision, CalRecycle would again be setting precedent and be setting new policies by allowing greenwaste ADC use over 20%, where this permit is setting the ADC policy.

Whereas I appreciate the opportunity to discuss ADC policy in the future one more time since the pathway from the August 2014 Investigation was enforcing ADC issues on a permit-by-permit basis. The concurrence with this SWFP Revision permit is already setting ADC policy on a permit-by-permit basis that the CIWMB would have never allowed in their day.

I will not be speaking at the February 16, 2016 CalRecycle monthly meeting as we all have more important issues to attend to, and your decision will not be changing, and we would have to hear about seasonal adjustments, stockpiling and misreporting, which would have no bearing in this case where 24% is average over the entire year, each and every year,.

Please have the Staff Report discuss the ADC issues in terms of 24% use in the JTD, with justification of that much use referencing past policies and case studies, and that CalRecycle is explicitly concurring with the JTD for 24% green waste ADC use for transparency.

Happy Groundhog Day.....Evan



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